

Comment Set 39

Printed on Recycled Paper

PLANNING DEPARTMENT



Comment Set 39

April 13, 2006

Ms. Valerie Van Way
Environmental Coordinator
State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

Subject: Comments on Chevron Marine Terminal (Long Wharf) Draft EIR
Proposed 30-Year Lease Extension
(SCH No. 98112080/CSLC EIR No. 688)

Dear Ms. Van Way,

Thank you for the opportunity to comment on this EIR. We appreciate the State Lands Commission's early efforts to coordinate with the City on ensuring the widest distribution of the notices announcing the DEIR's availability and DEIR public hearing. We further appreciate the efforts of SLC Staff to hold the public hearing in the Richmond City Council Chambers. We find the DEIR to be very comprehensive, addressing a wide range of issues from shipping to air quality. Notwithstanding, we have important concerns that we trust you will afford careful consideration.

The Chevron Refinery and associated industrial uses has traditionally played a significant role in Richmond's economy. However, the City has a responsibility to ensure that environmental impacts from Chevron's activities are minimized. The City's principal concerns include; project description, jurisdictional matters, and cumulative impacts. Additionally, we are concerned about impacts to the environment and economy resulting from oil spills, air quality, and socioeconomic impacts of Chevron's overall Richmond activities and operations. Impacts on the planned Bay Trail are also of paramount concern. Finally, environmental justice continues to be a concern of the City.

Project Description/Baseline Analysis

The DEIR assumes no increase in ship calls or refinery throughput. This assumption fails to account for the evolving nature of shipping and refinery operations, which are, in turn, dependent upon changes in technology (i.e. ship design, etc.) and the energy market. The analysis needs to account for additional traffic (project and cumulative) and throughput scenarios.

39-1